

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Changes in Part 97
With regard to Amateur Radio
Service Restructuring

RM-10867, RM-10868
RM-10866, RM-10870

To: The Commission

Comments from the Albemarle Amateur Radio Club (VA)

Background

The Albemarle Amateur Radio Club (AARC) is an ARRL Affiliated Club serving the 1500 Amateur Radio operators that reside in Charlottesville, Virginia and the surrounding counties. The club works to promote Amateur Radio and provide support to public service events. The AARC offers instruction to individuals interested in becoming Amateur Radio operators and provides examination opportunities by conducting examinations 2-3 times a year. We thank the Commission for the opportunity to comment on the petitions.

RM-10867 – ARRL

We favor the creation of an entry class license that includes HF privileges. The numbers show that the Commissions' decision to create the no-code Technician with VHF and UHF privileges was very successful in bringing new people into the hobby. It is clear that the best way to attract new people to the service at this time and ensure that new licensees upgrade to fulfill the purposes outlined for Amateur Radio is to provide an entry class license that offers the HF experience. The name of this license should be

‘Communicator’ which no longer has the negative attachment of a few decades ago. It will describe the license more than adequately.

We believe that the new entry class should require a 25-question examination from a new 200-question pool if it is still the Commission’s intention to include RF susceptibility questions in the exams. The test materials should be designed in such a way as to require the applicant to demonstrate the knowledge they will need to get on the air and operate with an understanding of the “rules of the road.”

We believe that the new entry class operator should be allocated 50 kHz of voice/image privileges on 75, 40 and 15 meters. We also believe that on 10 meters they should be granted 28.300 to 28.500 MHz. We agree that the new entry class licensees should also be granted CW/Data privileges on 80,40, 15 and 10 meters.

Members of the AARC believe that Technician licensees should be required to pass a written examination to upgrade to General class. We agree with the proposal to upgrade Technician Plus licensees to General and Advanced class licensees to Extra class. We understand that the that the Commission may decide that the automatic upgrades are the most effective way to move the FCC and the Amateur community to the three-class license structure, and a failure to do so could leave remnants of the current six-class structure in place for decades.

A majority of our members favors retaining code requirements for General and Extra class licenses.

RM-10868 – Radio Amateur Foundation

The RAF’s proposal that HF privileges be added to the Technician class might appear on the surface to be an acceptable path to accomplish the desired restructuring. However, doing this is simply another “patchwork”

approach to the problem. It fails to address the question of what to do with the existing Novice class operators.

While the proposal raises an important question with regard to the need for a reform in the question pool and the examination system, the suggestion that the question pool be removed from the public domain is simply unacceptable and inconsistent with good public policy.

We favor retaining the 5 wpm code requirement for General and Extra class.

We believe that RAF's proposal that the entry class HF operator's phone and image privileges should be limited to the 160-15 and 10-meter bands is insufficient. Operation on the 160-meter band requires a significant amount of real estate to erect an antenna. This would be impossible for operators living in urban areas and any amateur living in an apartment, condominium or antenna-restricted complex. The result would be activity only in the evenings and at nighttime primarily during the winter months for amateurs residing in rural areas.

We believe that the entry operator should be granted phone privileges on the 80-40-15 and 10-meter bands. We feel it would be a mistake to limit their HF phone privileges to the 160-15 and 10-meter bands. During periods of low sunspot activity the 10 and 15 meter bands are not always open. While some would suggest this would present an incentive to upgrade, we believe that it would be discouraging to amateurs that gain this license during periods of low sunspot activity.

While we believe that a 10-day waiting period after a failed examination makes good sense, the simple fact is that it would be very difficult if not impossible to enforce given the current examination system. How would an ARRL-VEC examiner in one city know that a candidate had failed a W5YI-VEC exam on the previous day at another location? We believe the

best solution is to rule that if a candidate fails an element in a session, he/or she may not retake that element in the same examination session.

We strongly agree with the RAF's proposal for relaxed emission standards to permit a bandwidth of up to 15 kHz between 29.0 and 29.3 MHz for digital experimentation.

We agree with RAF's proposal for an automatic upgrade of Advanced class licensees to Extra class.

We strongly agree with RAF's proposal that Vanity calls be limited to amateurs who have been licensed for two years or more and hold a valid General or Extra class license.

We agree with RAF's comments that a CW could be vital to our nation in the event of a national emergency. We believe that this is justification for retaining the CW requirement at the Extra class.

RM-10869 Ronald Lowernce, K4SX

We agree with the suggestion in this petition that the code examination for General class be retained at 5 wpm. A significant number of our members, while not a majority, believe the Extra class should have a 13 wpm code requirement.

RM-10870 National Conference of Volunteer Examiner Coordinators

We agree with the NCVEC's proposal for a new entry class license with HF privileges and examination requirements along the lines of the earlier Novice examination. We see this as being consistent in spirit with RM-10867.

We disagree with NCVEC's proposal to totally eliminate Morse code testing. As stated earlier, we favor the retention of the 5 WPM code examination for General Class.

We agree with the concept of limiting the output power for these new entry class licensees to 100 watts below 24 MHz and 50 watts above 24 MHz. This will be an effective way to protect new operators from injury, automatically enforce RF safety standards and minimize potential initial interference problems.

We agree with the proposal that Novices should automatically be upgraded to the new entry class, the Technician Plus licensees be automatically upgraded to General and the Advanced class license holders upgraded to Extra class.

One of the reasons that the Novice class succeeded was that Novice operators were easily identified on the bands by their distinctive call signs. This enabled other operators to be certain that these Novices operated within their privileges. It also enabled seasoned operators to identify the newcomers so the experienced operators could be more sensitive to their needs, offer encouragement and Elmer them along in the hobby.

The distinctive call sign also provided an incentive to upgrade. Once operators gained confidence and skills they worked hard to upgrade so they could shed the "Novice" looking call sign. We agree with NCVEC's suggestion that the new entry class licensees be identified with calls from the NA1AAA through NZ0ZZZ block.

We disagree with NCVEC's proposal that the entry class licensee be required to use commercially available equipment (including kits). While it is true that a large majority of amateurs use commercially available equipment, we believe that it would be wrong to close this aspect of the hobby to new operators. Construction projects are excellent ways to learn.

We also believe that it would be difficult and not cost effective for the FCC to attempt to enforce a regulation of this nature within the amateur ranks.

Conclusion

We wish to thank the Commission for the opportunity to comment on the restructuring proposals. We urge the Commission to move with all deliberate speed on the creation of a new entry license for Amateur Radio with HF CW/data/voice/image privileges. We are concerned that upgrade activity will slow to a snail's pace until the Commission makes it's ruling on the restructuring. We favor the automatic upgrading of existing licenses for those who hold licenses for classes no longer being issued by the commission and the retention of the 5 WPM requirement for General class.

Sincerely

Robert E. Pattison, K4DU
Director of the Albemarle Amateur Radio Club and
Co-Chair of Committee on Amateur Radio Restructuring